

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

STEPHEN HISER AND DANA ACE,
Individually and on behalf of all others
similarly situated,

Plaintiffs,

V.

NZONE GUIDANCE, LLC,

Defendant.

Civil Action No. 1:18-cv-1056

AFFIDAVIT OF BRAD VAUGHN

STATE OF TEXAS

COUNTY OF WILLIAMSON

BEFORE ME, the undersigned authority, on this day personally appeared Brad Vaughn, known to me to be the person whose name is subscribed below, and who under oath did state the following:


1. My name is Brad Vaughn. I am over the age of twenty-one (21) years, of sound mind, capable of making this Affidavit, and fully competent to testify as to the matters stated herein.
2. I am the President of NZone Guidance, LLC ("NZone"). As part of my job duties and responsibilities, I have access to and knowledge of contracts entered into by NZone, including the agreement with RUSCO Operating, LLC, a wholly owned subsidiary of RigUp, Inc.¹
3. This Affidavit is based on my own personal knowledge based upon my own personal knowledge as a result of the job duties I have performed while employed by NZone and a review of records maintained by NZone in its regular course of business.

¹ For purposes of this affidavit, “RigUp” includes RUSCO Operating, LLC, a wholly owned subsidiary of RigUp, Inc.

4. NZone is an oil and gas services company providing among other things directional drilling and MWD services to oil and gas exploration companies.
5. In order for NZone to be connected to independent professionals to help NZone on potential projects, on September 15, 2016, I signed a contract on behalf of NZone with RigUp titled, "Agreement Between Enterprise & RigUp For Use Of RigUp Service."
6. By using RigUp's service, NZone was able to propose projects on RigUp's platform for selection by independent professionals, such as the named plaintiffs in this case

I declare under penalty of perjury that the foregoing is true and correct. Executed this 20th day of February, 2019.

Brad Vaughn
President, NZone Guidance, LLC

DocuSigned by:

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